

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

WESTERN DIVISION, SS.

C. A. NO. 04CV30241-MAP

MICHAEL ERALI, II

Plaintiff

v.

TOWN OF ORANGE,  
Defendant

DEFENDANT'S PROPOSED  
JURY VOIR DIRE

Now comes the defendant in the above-captioned action, Town of Orange, Massachusetts, and hereby respectfully proposes the following voir dire questions for submission to the jury:

1. Does any member of the jury panel know any of the parties or witnesses in this case?
2. Is there any member of the jury panel who has sued any municipality or municipal agency, official or board?
3. Does any member of the jury panel have an immediate relative or close friend who has sued a municipality?
4. Has any member of the jury panel ever been a witness in a lawsuit against a municipality?
5. Is there any member of the jury panel who is or has been employed by a municipality, or a municipal agency, official, or board, or whose relative or friend is or has been employed by a municipality, or a municipal agency, official or board?

6. Is there any member of the jury panel who feels that he or she, family members, or friends have been unfairly treated in any manner by any municipality, or municipal agency, official, or board?
7. Is there any member of the jury panel who feels that he or she, or a relative or friend, has been discriminated against in the workplace?
8. Is there any member of the jury panel who feels that he or she, or a relative or friend, has had his or her employment unlawfully terminated?
9. Is there any member of the jury panel who feels that he or she, or a relative or friend, has been sexually harassed in the workplace?
10. Has any member of the jury panel been a party to a sexual harassment lawsuit?
11. Does any member of the jury panel have a close friend or relative who has been a party to a sexual harassment lawsuit?
12. Has any member of the jury panel been a party to a constructive discharge lawsuit?
13. Does any member of the jury panel have a close friend or relative who has been a party to a constructive discharge lawsuit?
14. Has any member of the jury panel been a party to a lawsuit alleging infliction of emotional distress?

15. Does any member of the jury panel have a close friend or relative who has been a party to a lawsuit alleging infliction of emotional distress?

Respectfully submitted,

TOWN OF ORANGE

By its attorneys,

/s/ Carolyn M. Murray

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Carolyn M. Murray (BBO# 653873)

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Date: February 16, 2007

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